



September 9, 2024

**Sent via ECF**

Hon. Ona T. Wang  
 Daniel Patrick Moynihan  
 United States Courthouse  
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RE: *Authors Guild et al. v. OpenAI Inc. et al.*, No. 1:23-cv-8292  
*Alter et al. v. OpenAI Inc. et al.*, No. 1:23-cv-10211  
*The New York Times Co. v. Microsoft Corp., et al.* No. 1:23-cv-11195  
*Basbanes et al. v. Microsoft Corp. et al.*, No. 1:24-cv-0084  
*New York Daily News, LP, et al. v. Microsoft Corp., et al.*, No. 1:24-cv-3285  
*The Center for Investigative Reporting, Inc. v. OpenAI, Inc., et al.*, No. 1:24-cv-4872

Dear Magistrate Judge Wang:

On behalf of all parties in the above-referenced actions and pursuant to the Court's August 29 Scheduling Order, counsel for Microsoft hereby submits the proposed agenda for the September 12, 2024 Status Conference.

The parties met and conferred in an effort to streamline the issues before the Court. All items identified by any party for resolution have been included in the attached lists, although not all parties agree as to the propriety of addressing items that (a) were filed after the Court's August 29 order, and/or (b) have not yet been docketed.

In light of the number of open disputes and the overlap in some of the issues, the parties have provided two lists organizing the information for the Court's review: **Exhibit A** (organized by case) and **Exhibit B** (organized by issue). The attached list is comprehensive and includes all currently pending disputes that have been referred to Your Honor, including those filed prior to Your Honor's appointment to these matters.

All parties wish to express their gratitude to the Court for its attention to these matters.

Respectfully submitted,

*/s/ Annette Hurst*

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Annette Hurst